

STATE OF SOUTH CAROLINA

(Caption of Case)

Midwestern Telecommunications, Inc.
 Application for Designation as an Eligible
 Telecommunications Carrier for the Purposes of
 Receiving Federal Universal Service Support
 Pursuant to Section 214(e)(2) of the
 Telecommunications Act of 1996

BEFORE THE
 PUBLIC SERVICE COMMISSION
 OF SOUTH CAROLINA

COVER SHEET

DOCKET
 NUMBER: 2007 - 32 - C

(Please type or print)

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☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other: Filing of Initial Testimony

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☐ Electric/Telecommunications
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☐ Electric/Water/Telecom.
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☐ Gas
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☒ Telecommunications
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☐ Resale Amendment
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July 10, 2007

Mr. Charles L. A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Midwestern Telecommunications, Incorporated Application for
Designation as an Eligible Telecommunications Carrier for the
Purposes of Receiving Federal Universal Service Support Pursuant
to Sections 214(e)(2) of the Telecommunications Act of 1996
Docket No. 2007-32-C

Dear Mr. Terreni:

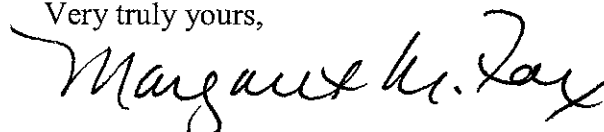
Enclosed for filing on behalf of the South Carolina Telephone Coalition, please find an original and two (2) copies of the Initial Testimony of Glenn H. Brown in the above-referenced matter. By copy of this letter and Certificate of Service, all parties of record are being served by U. S. Mail with a copy of this Testimony.

Please note that the attached document is an exact duplicate, with the exception of the form of the signature, of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

Please clock in a copy of the Testimony and return it with our courier.

Thank you for your assistance.

Very truly yours,



Margaret M. Fox

MMF/rwm
Enclosures

cc: Parties of Record

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

DOCKET NO. 2007-32-C

IN RE Midwestern Telecommunications, Incorporated)
Application for Designation as an Eligible)
Telecommunications Carrier for the Purposes)
of Receiving Federal Universal Service)
Support Pursuant to Sections 214 (e)(2) of the)
Telecommunications Act of 1996)

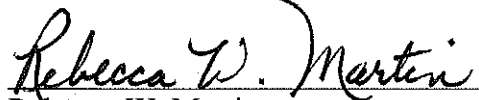
**CERTIFICATE
OF SERVICE**

This is to certify that I, Rebecca W. Martin, an employee with the McNair Law Firm, P. A., have this date served one (1) copy of the attached Initial Testimony of Glenn H. Brown in the above-referenced matter to the persons named below by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

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July 10, 2007

Columbia, SC

BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Midwestern Telecommunications, Inc.)	
Application for Designation as an Eligible)	
Telecommunications Carrier for the Purposes of)	Docket No. 2007-32-C
Receiving Federal Universal Service Support)	
Pursuant to Section 214(e)(2) of the)	
Telecommunications Act of 1996)	

INITIAL TESTIMONY OF
GLENN H. BROWN
ON BEHALF OF THE
SOUTH CAROLINA TELEPHONE COALITION

July 10, 2007

1 **Q. Please state your name and business address.**

2 **A. My name is Glenn H. Brown, and my business address is PO Box 21173, Sedona,**
3 **Arizona 86341.**

4 **Q. Please summarize your current employment and prior business experience.**

5 **A. I am President of McLean & Brown, a telecommunications consulting firm**
6 **specializing in universal service and intercarrier compensation issues. Prior to**
7 **joining McLean & Brown in 1998, I worked for U S WEST for 28 years, during**
8 **which time I held a number of senior management positions in the regulatory and**
9 **public policy area. I have testified before numerous state regulatory commissions,**
10 **the Federal Communications Commission (FCC) and the United States Congress**
11 **on a wide variety of telecommunications costing, pricing and regulatory issues.**
12 **My last six years with U S WEST were spent in Washington, DC, where I was**
13 **very involved in the implementation of the Telecommunications Act of 1996, with**
14 **particular emphasis on universal service issues.**

15 **Q. Please summarize your educational experience.**

16 **A. I have a Bachelor of Science in Industrial Engineering from Lehigh University,**
17 **and an MBA from the University of Colorado. Both of my degree programs**
18 **focused on computer modeling technology and applications.**

19 **Q. Please describe your experience with universal service issues.**

20 **A. I have been active in almost every major universal service proceeding before the**
21 **FCC since the passage of the 1996 Act. In 1998, the FCC appointed the Rural**
22 **Task Force (RTF) to develop policy recommendations for rural**
23 **telecommunications carriers. While not a member of the RTF, I attended almost**

1 all of its meetings, and assisted it in both analytical matters and in the preparation
2 and drafting of several white papers. In my current position I provide advice and
3 assistance to small and mid-size telecommunications companies regarding
4 universal service, intercarrier compensation and other regulatory and pricing
5 issues before federal and state regulatory bodies.

6 **Q. Have you previously testified before the Public Service Commission of South**
7 **Carolina?**

8 **A.** Yes. I have testified as a witness for the South Carolina Telephone Coalition in
9 Docket No. 2003-158-C, Petition of FTC Communications, Inc. d/b/a FTC
10 Wireless for Designation as an Eligible Telecommunications Carrier (ETC) in the
11 State of South Carolina, and Docket No. 2003-227C, Application of Hargray
12 Wireless, LLC for designation as an Eligible Telecommunications Carrier Under
13 47 U.S.C. § 214(e)(2).

14 **Q. On whose behalf are you presenting testimony?**

15 **A.** I am presenting testimony on behalf of the South Carolina Telephone Coalition
16 (SCTC), including its member companies listed in Appendix A to my testimony.

17 **Q. What are the purposes of your testimony?**

18 **A.** The purposes of my testimony are:

- 19 1. To discuss the important responsibilities of the Public Service Commission of
20 South Carolina (Commission) under the Telecommunications Act of 1996 in
21 regards to implementation of the federal universal service program.
- 22 2. To describe how the standards for determining when approving a particular
23 ETC application is in the public interest have evolved over time, and comment

1 on the standards that the Commission should use in evaluating the public
2 interest aspects of the application of Midwestern Telecommunications, Inc.
3 (MTI) in this proceeding.

- 4 3. To provide my opinion on whether the application of MTI is consistent with
5 the public interest and should be approved by this Commission.

6 **COMMISSION RESPONSIBILITIES UNDER THE 1996 ACT.**

7 **Q. What are the key sections of the Telecommunications Act of 1996 and the**
8 **FCC rules that deal with universal service and the public interest test for**
9 **designating multiple ETCs?**

10 **A.** Section 214(e) of the 1996 Act (47 U.S.C. § 214(e)) deals with the designation of
11 multiple ETCs; 47 CFR § 54.201 contains the FCC's corresponding regulations.

12 **Q. Please summarize the key elements of Section 214(e) and FCC Rule 54.201**
13 **regarding the designation of multiple ETCs.**

14 **A.** 47 U.S.C. Section 214(e)(1) states that, to be eligible for ETC status, a carrier
15 must offer the defined universal service elements (the FCC rules currently define
16 nine elements) throughout the service area for which the designation is received,
17 and advertise the availability of such services in media of general distribution.
18 Section 214(e)(2) states that, *consistent with the public interest, convenience and*
19 *necessity*, the Commission *may*, for rural telephone companies, and *shall*, for non-
20 rural companies, designate more than one ETC. It further states that, "before
21 designating an additional [ETC] for an area served by a rural telephone company,
22 the State commission shall find that the designation is in the public interest."
23 FCC Rule 54.201 contains very similar language.

1 **THE EVOLVING PUBLIC INTEREST STANDARDS FOR COMPETITIVE ETC**
2 **DESIGNATION**
3

4 **Q. Does the 1996 Act or do the FCC regulations say how the public interest**
5 **determination should be made?**

6 **A.** While neither the 1996 Act nor the FCC rules provide specific guidance in
7 conducting the public interest test, over the past seven years the FCC has issued a
8 series of decisions that have provided an evolving set of guidelines regarding how
9 it believes that the public interest determination should be made. In looking back
10 over this time period there have been three distinct phases in the evolution of the
11 FCC's thinking. The specific orders that defined these phases, and some of the
12 key characteristics of the public interest criteria utilized during each phase, are as
13 follows:

14 **1. The *Wyoming* and *Alabama* Orders¹**

- 15 • December, 2000 through January, 2004
- 16 • Competition defines the public interest
- 17 • Designation of multiple ETCs would advance competition in high-cost
18 rural areas, and therefore is in the public interest
- 19 • Although not formally stated, burden was on the wireline incumbent to
20 prove that the ETC designation was not in the public interest

¹ *In the matter of Federal-State Joint Board on Universal Service, Western Wireless Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, CC Docket No. 96-45, DA 00-2896, released December 26, 2000 (Wyoming Order); *In the Matter of Federal-State Joint Board on Universal Service, RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunications Carrier Throughout its Licensed Service Area in the State of Alabama*, CC Docket No. 96-45, DA 02-3181, released November 27, 2002 (Alabama Order).

1 **2. The Virginia Cellular Order²**

- 2 • January, 2004 through March, 2005
- 3 • Competition, alone, was not sufficient to satisfy the public interest test
- 4 • A more stringent, public interest test was necessary due to rapid growth in
- 5 support to competitive ETCs
- 6 • A fact-specific analysis was required to demonstrate that the benefits of
- 7 designating multiple ETCs outweighed the costs of supporting multiple
- 8 networks
- 9 • The competitive ETC must demonstrate its commitment and ability to
- 10 provide the supported services throughout the designated service area
- 11 within a reasonable time frame
- 12 • It was clearly stated that the burden is on the ETC applicant to prove that
- 13 its designation as an ETC in the rural telephone company is in the public
- 14 interest

15 **3. The March 17, 2005 ETC Designation Order³**

- 16 • This Order was issued in response to a Recommended Decision by the
- 17 Federal-State Joint Board on Universal Service released February 27,
- 18 2004.
- 19 • The Order provides that in satisfying its burden of proof, the ETC
- 20 applicant must:
- 21 ➤ Provide a five-year plan demonstrating how high-cost universal service
- 22 support will be used to improve its coverage, service quality or
- 23 capacity in every wire center for which it seeks designation and
- 24 expects to receive universal service support;
- 25 ➤ Demonstrate its ability to remain functional in emergency situations;
- 26 ➤ Demonstrate that it will satisfy consumer protection and service quality
- 27 standards;
- 28 ➤ Offer local usage plans comparable to those offered by the ILEC in the
- 29 areas for which it seeks designation; and

² *In the Matter of Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia* CC Docket No. 96-45, FCC 03-338, released January 22, 2004 (Virginia Cellular Order).

³ *Report and Order, In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, FCC 05-46, released March 17, 2005 (ETC Designation Order).

- Acknowledge that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designation.

As can be clearly seen, there has been a steady progression to more rigorous ETC evaluation standards as the FCC has gained real-world experience with the ETC designation process and its impact on the overall size of the USF.

Q. Have there been more recent developments that indicate further evolution in prevailing opinion surrounding the consideration of the public interest impacts of ETC designations?

A. Yes. On May 1, 2007, the Federal-State Joint Board on Universal Service (Joint Board) issued a Recommended Decision in which it recommended that the FCC “take immediate action to rein in the explosive growth in high-cost universal service disbursements.”⁴ Specifically, the Joint Board recommended that:

- The FCC impose an interim, emergency cap on the amount of high-cost support that competitive eligible telecommunications carriers (CETCs) may receive for each state based on the average level of CETC support distributed in that state in 2006;⁵

⁴ Recommended Decision *In the Matter of High-Cost Universal Service Support and Federal-State Joint Board on Universal Service*, WC Docket No. 05-337 and CC Docket No. 96-45, FCC 07J-1, released May 1, 2007 (Recommended Decision) at paragraph 1. The Joint Board goes on to state at paragraph 4 “While support to incumbent local exchange carriers has been flat or even declined since 2003, by contrast in the six years from 2001 to 2006, competitive ETC support grew from \$15 million to almost \$1 billion – an annual growth rate of over 100 percent. Based on current estimates, competitive ETC support in 2007 will reach at least \$1.28 billion if the Commission takes no action to curtail its growth. Moreover, if the Commission were now to approve all competitive ETC petitions currently pending before the Commission, high-cost support for competitive ETCs could rise to as much as \$1.56 billion in 2007. (This estimate does not include the effects of states granting any of the more than 30 competitive ETC petitions that are currently pending in various state jurisdictions.) High-cost support to competitive ETCs is estimated to grow to almost \$2 billion in 2008 and \$2.5 billion in 2009 even without additional competitive ETC designations in 2008 and 2009.”

⁵ *Id.* at paragraph 1.

- 1 • The Joint Board further explored comprehensive high-cost distribution
2 reform;⁶ and
- 3 • The FCC should consider abandoning or modifying the identical per-line
4 support rule, since this rule seems to be one of the primary causes for the
5 explosive growth in the fund.⁷

6 At the same time that the Joint Board issued its Recommended Decision, it also
7 released a Public Notice seeking comment on various proposals to reform the
8 high-cost universal service distribution mechanisms. What is clear from this
9 Recommended Decision is that the reality is now beginning to sink in that prior
10 standards for CETC designation and funding were too loose, and the result has
11 been an explosive growth in funding that now threatens the very sustainability of
12 the universal service fund. In hindsight, this Commission was wise to apply the
13 rigorous standards that it did in its decision in the FTC Wireless ETC case in
14 2005.⁸

15 **Q. How did this Commission address the need to consider the impact of growth**
16 **in the universal service fund on the public interest determination process in**
17 **its earlier decision?**

18 **A. In its 2005 decision denying ETC status to FTC Wireless the Commission stated:**

19 FTC has not addressed the very real risks that spreading finite
20 universal service resources too thin will create to critical “carrier of
21 last resort” principles.⁹

⁶ *Id.*

⁷ *Id.* at paragraph 12.

⁸ Order No. 2005-5, dated January 7, 2005 in Docket No. 2003-158-C *In re: Application of FTC Communications DBA FTC Wireless for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(2) of the Communications Act of 1934.*

⁹ *Id.* at page 28, Findings and Conclusions paragraph 14.

1 The Commission went on to say that:

2 Explosive growth in the size of the federal USF could threaten the
3 long-term viability of the fund, thereby jeopardizing the continued
4 provision of affordable basic local exchange service to rural
5 subscribers. ... The federal USF is and should be treated as a scarce
6 national resource.¹⁰

7
8 I have participated in many ETC cases throughout the country in the past few
9 years, and I found the Commission's decision in the FTC case to be one of the
10 most thoughtful and forward-looking decisions in terms of its attention to the
11 sustainability of the USF and its seeking to approve additional ETCs only when
12 such funding can be clearly demonstrated to be in the public interest.

13 **Q. Do you believe that excessive growth in the fund is a factor which should be**
14 **taken into consideration in the public interest analysis?**

15 **A.** Yes. I believe that the Joint Board said it well in the Recommended Decision
16 when it said "High-cost support has been rapidly increasing in recent years and,
17 without immediate action to restrain growth in competitive ETC funding, the
18 federal universal service fund is in dire jeopardy of becoming unsustainable."¹¹

19 The public has much at risk if the sustainability of the universal service fund is
20 threatened. Rural telephone companies, such as the SCTC members, have relied
21 on sufficient and predictable universal service funding to construct and maintain
22 wireline networks in rural and high-cost areas of South Carolina that would not be
23 economically viable in the absence of universal service funding. If excessive
24 growth causes the fund to become unsustainable, then the ability of all ETCs,

¹⁰ *Id.* at page 31, Findings and Conclusions paragraph 15.

¹¹ Recommended Decision at paragraph 4.

1 wireline or wireless, to function as reliable Carriers of Last Resort would be
2 threatened, and the public interest would be greatly harmed.

3 **THE MTI APPLICATION**

4 **Q. What is your understanding of the MTI business operation and the request**
5 **that it is making of the Commission in this proceeding?**

6 A. My understanding is that MTI is a resale provider of basic telephone service using
7 unbundled network elements obtained from AT&T/BellSouth, and that it seeks
8 designation as an ETC for receipt of federal universal service support.

9 **Q. Is it possible for a carrier to be designated only for the receipt of low-income**
10 **LifeLine and LinkUp support and not high-cost support?**

11 A. To the best of my knowledge and understanding, there is only one designation that
12 a state commission can make, and that is that a company is an Eligible
13 Telecommunications Carrier (ETC). Once designated as an ETC, a carrier is
14 eligible for both high-cost and low-income universal service support in the
15 telephone company service areas for which it is granted such designation.

16 **Q. MTI states in its Application that it is only seeking ETC designation in the**
17 **non-rural AT&T/BellSouth service territory in South Carolina, and that**
18 **"MTI does not request ETC designation in any rural area at this time."¹² Is**
19 **it still necessary that the Commission make a public interest finding in this**
20 **case?**

21 A. Yes, it is. Earlier in my testimony I described an evolution, over time, in the
22 manner in which the FCC has viewed the public interest role in the ETC

¹² MIT Application at paragraph 7.

1 designation process. In the early days of ETC designations, the role of universal
2 service funding was viewed as one of "promoting competition." During this time
3 period the FCC concluded that any ETC application in a non-rural study area that
4 met the criteria of 214(e)(1) would be "*per se*" in the public interest.¹³ In the
5 Virginia Cellular Order the FCC concluded that a more stringent, public interest
6 test was necessary due to rapid growth in support to competitive ETCs. In
7 paragraph 27 of this Order the FCC stated:

8 We note that the Bureau previously has found designation of additional ETCs
9 in areas served by non-rural telephone companies to be *per se* in the public
10 interest based upon a demonstration that the requesting carrier complies with
11 the statutory eligibility obligations of section 214(e)(1) of the Act. We do not
12 believe that designation of an additional ETC in a non-rural telephone
13 company's study area based merely upon a showing that the requesting carrier
14 complies with section 214(e)(1) of the Act will necessarily be consistent with
15 the public interest in every instance.

16 In the remainder of this Order the FCC evaluated the factual showing made by
17 Virginia Cellular, and concluded that, based upon this showing, approval of ETC
18 status in the requested non-rural areas of Virginia would be in the public interest.

19 **Q. Since MTI is only requesting ETC status in the non-rural AT&T/BellSouth**
20 **study area, why does the SCTC have an interest in this proceeding?**

21 **A.** SCTC is participating in this proceeding for two important reasons. First, MTI's
22 application states that it is not requesting ETC designation in rural telephone
23 company service areas "*at this time.*" We interpret this to mean that MTI is
24 directly leaving open the possibility of seeking ETC status in rural areas of South
25 Carolina at some later date. Given that this represents the first time that this

¹³ See, e.g., *Cellco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket No. 96-45, Memorandum Opinion and Order, 16 FCC Rcd 39

1 Commission has considered an application of a wireline resale carrier for ETC
2 status, SCTC wants to be on record with its perspective on the public interest
3 aspects of such a potential designation. The second reason that SCTC believes its
4 participation in this proceeding is important is that, as this Commission correctly
5 recognized in its first ETC designation order, "the universal service fund is a
6 scarce national resource."¹⁴ Since SCTC members depend upon sustainable
7 universal service support as an important element of their ability to serve some of
8 the highest-cost areas of South Carolina, we believe that ETC status should only
9 be granted when a prospective ETC applicant can clearly demonstrate that such
10 designation would serve the public interest.

11 **Q. Have you reached any conclusions at this time regarding whether approval**
12 **of MTI's application would be in the public interest?**

13 **A.** Under the public interest criteria that have been in place since the FCC's Virginia
14 Cellular Order, MTI carries the burden of proving that approval of its application
15 would be in the public interest. I presume that MTI will be making its best efforts
16 towards this end in its initial testimony filing, which is being made concurrent
17 with this testimony. I will state my preliminary conclusion, however, that MTI
18 faces a high hurdle in proving that approval of its Application would be in the
19 public interest. As a resale carrier, MTI has made no investment in
20 telecommunications network facilities in the State of South Carolina, and
21 presumably has no plans to do so in the future. One of the primary purposes of
22 universal service funding is to provide support for telecommunications

(Com. Car. Bur. 2000).

1 infrastructure in high-cost and rural areas of the state so that ETCs are able to
2 function as reliable Carriers of Last Resort. Particularly at a time when the very
3 sustainability of the universal service fund is in question, the Commission should
4 require a sound fact-based demonstration that the public benefits of designating
5 MTI as an ETC exceed the public costs that would be created. MTI presents no
6 facts or data that would support such a conclusion in its Application. After
7 reviewing MTI's initial testimony in this proceeding I will offer my opinion on
8 whether they have met this burden in my reply testimony that is due to be filed
9 July 24, 2007.

10 **Q. Does this conclude your testimony at this time?**

11 **A. Yes.**

¹⁴ See Commission Order No. 2005-5 at p. 31, Findings and Conclusions paragraph 15.

Appendix A

List of Participating South Carolina Telephone Coalition Member Companies

Chesnee Telephone Company
Chester Telephone Company
Ft. Mill Telephone Company, d/b/a Comporium Communications
Home Telephone Company, Inc.
Horry Telephone Cooperative, Inc.
Lancaster Telephone Company, d/b/a Comporium Communications
Lockhart Telephone Company
McClellanville Telephone Company
Norway Telephone Company
Palmetto Rural Telephone Cooperative, Inc.
Piedmont Rural Telephone Cooperative, Inc.
PBT Telecom
Ridgeway Telephone Company
Rock Hill Telephone Company, d/b/a Comporium Communications
Sandhill Telephone Cooperative, Inc.
St. Stephen Telephone Company
West Carolina Rural Telephone Cooperative, Inc.
Williston Telephone Company